

REMARKS

Claims 1 to 59 were pending in the application at the time of examination. Claims 1 to 59 stand rejected as anticipated.

Applicant has amended the description to properly reflect the status of the U.S. Patent Applications cited therein. Applicant respectfully requests reconsideration and withdrawal of the objection to the specification.

Claims 10, 30, and 49 stand objected to because of informalities. Applicant has amended each of Claims 10, 30, and 49 as suggested by the Examiner. A grammatical redundancy has also been amended in each of these claims. Applicant respectfully requests reconsideration and withdrawal of the objection to Claims 10, 30, and 49.

Applicant has amended Claims 1, 39 and 40 to more clearly recite the invention. The amendments are supported, for example, by paragraphs 60 to 62 of the disclosure.

Claims 7, 8, 46 and 47 are amended to correct informalities introduced by the amendment to the independent claim that each depends from.

Claims 9 and 48 have been amended to correct a grammatical informality.

Claims 1 to 18 and 21 to 57 stand rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent Application Publication No. 2005/0149926 of Saltz, hereinafter referred to as Saltz.

Applicant respectfully traverses the anticipation rejection of Claim 1 in view of Saltz. Applicant respectfully notes that in an anticipation rejection, it is not sufficient that a reference use some of the same terms as recited in Applicant's claims, but rather the "The identical invention must be shown in as complete detail as is contained in the ... claim." MPEP §2131, 8th. Ed., Rev. 3, p. 2100-76 (August 2005).

Paragraphs 38 to 55 of Saltz were cited as teaching exactly the invention of Claim 1. Paragraphs 38 to 52 do

not mention an AID and the rejection has cited no teaching that the firewall control blocks described in these paragraphs are multiple parameters included in a request received on the smart card as recited in Claim 1.

Paragraph 53 stated " . . . the Application Identifier Data (AID) can be used as the firewall control value(e.g., 402, 406 of Fig. 4)." Again, a firewall control value has nothing to do with selecting a desired application. In addition, this paragraph fails to teach how the AID is used and so fails to describe the invention in the same detail as in the Claim.

The Examiner's attention is called to Paragraph 57 of Saltz that stated "only the RID value is used." The RID value fails to teach "multiple parameters" and fails to teach " receivinga request including multiple parameters," as recited in Claim 1.

The Examiner's attention is also called to Paragraph 61 that stated "the PIX values of the first and second applets can be compared." Again, using the PIX value of an applet fails to teach "multiple parameters" and fails to teach " receivinga request including multiple parameters."

Finally, Saltz is concerned with "whether a JavaTM applet should be granted access to another JavaTM and/or JavaTM package. (Saltz, paragraph 44.) Thus, Saltz fails to teach or suggest "retrieving an AID" upon finding a match.

Finally, Slatz stated:

. . . As FIG. 2 illustrates, a plurality of Java Card.TM. **applications (or applets) A, B, C, D, E, F and G may reside on the Java Card.TM.** (Emphasis Added.)

Saltz, paragraph [0038].

[0047] To further illustrate, FIG. 4 illustrates simplified firewall control blocks A, B, C, D, E, F and G that can respectively be implemented for applets A, B, C, D, E, F and G of FIG. 2.

Saltz, paragraph [0047].

Hence, Saltz expressly taught that the firewall control blocks and values therein are separate and distinct from applications. Accordingly, to interpret a firewall control value or a firewall control block as an application is contrary to the express definitions presented in the Saltz. This is further evidence that the rejection is not well founded.

Only one of the above distinctions is required to overcome the anticipation rejection. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 1 in view of Saltz.

Claims 2 to 18 depend from Claim 1 and so distinguish over Saltz for at least the same reasons as Claim 1. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 2 to 18 in view of Saltz.

Applicant respectfully notes that a separate rejection of Claim 21 was not given. As best it is understood, with respect to Claim 21, the rejection stated in part:

. . . the applet selector calls a method on a control value 302, which serves as an AID interpreter associated with each application on the smart card to perform the retrieving . . . wherein the AID interpreter 302 associated with each application . . .

Applicant respectfully traverses the anticipation rejection of Claim 21 in view of Saltz. The rejection equates "firewall control value 302" with "an AID interpreter." However, Saltz stated:

"The firewall control 302 [Sic] value provides access privileges definitions." Paragraph 45.

. . . the firewall control value 302 . . . can . . . be implemented as an array of bytes . . .
Paragraph 46.

In contrast, Claim 21 recites:

said AID interpreter is operable to retrieve and parse the stored AID into multiple parameters for identifying the application

A value implemented in an array of bytes, as taught by Saltz, fails to teach anything about an interpreter that is operable to retrieve and parse. A value can neither retrieve nor parse. Accordingly, the rejection has failed to demonstrate that Saltz teaches the invention of Claim 21 to the same level of detail as recited in Claim 21. In addition, as noted above and incorporated herein by reference, Saltz defined an application as being separate and distinct from a firewall control value. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 21 in view of Saltz.

Claims 22 to 33 depend from Claim 21 and so distinguish over Saltz for at least the same reasons as Claim 21. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 22 to 33 in view of Saltz.

Applicant respectfully notes that a separate rejection of Claim 34 was not given. As best it is understood, with respect to Claim 34, the rejection relied in part on the same information quoted above from the rejection for Claim 21.

Applicant respectfully traverses the anticipation rejection of Claim 34 in view of Saltz. Claim 34 includes a limitation similar to that discussed above with respect to Claim 21 and so the above comments with respect to Claim 21 in view of Saltz are incorporated herein by reference.

The rejection also stated in part:

the terminal transmits a request to the smart card specifying a desired application in terms of multiple parameters (paragraph [0039]);

Applicant first notes that the application recited in Claim 34 has specific characteristics that are not taught by

Saltz as noted above. Accordingly, even if the characterization of paragraph 39 were correct, it would not be sufficient to establish an anticipation rejection. Moreover, paragraph 39 stated ". . . the CAD 224 can . . . forward Application Protocol Data Unit (ADPU) commands . . ." The rejection has failed to establish that ADPU commands are "at least one set of multiple parameters for identifying a desired application on the smart cart, and a communications interface for exchanging messages with the smart card." Saltz fails in Paragraph 39 to describe the ADPU commands in detail and so fails to teach the invention in the same level of detail as recited in the claims. Accordingly, the rejection fails on at least two levels to demonstrate that Saltz teaches the invention in the same level of detail as recited in Claim 34. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 34 in view of Saltz.

Claims 35 to 38 depend from Claim 34 and so distinguish over Saltz for at least the same reasons as Claim 34. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 35 to 38 in view of Saltz.

Claim 39 is a means plus function claim with limitations equivalent to those of Claim 1. Accordingly, the above comments with respect to Claim 1 in view of Saltz are applicable and are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 39 in view of Saltz.

Claim 40 is a computer product claim that includes limitations similar to those discussed above with respect to Claim 1. Accordingly, the above comments with respect to Claims 1 in view of Saltz are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 40 in view of Saltz.

Claims 41 to 57 depend from Claim 40 and so distinguish over Saltz for at least the same reasons as Claim 40.

Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 41 to 57 in view of Saltz.

Claims 1, 2, 4, 19, 20, 40, 41, 58, and 59 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,530,232 hereinafter referred to as Taylor. The rejection stated in part:

each application has a stored application identifier (AID) (i.e., account number) . . . specifying a desired application in terms of multiple parameters (i.e., PIN) . . . it's inherently that the inputted PIN has be compared with the specified/stored PIN for verification and authentication) (col. 3, line 46 through col. 4, line 47 and col. 5, lines 12-470; .

Applicant respectfully traverses the rejection of Claim 1 in view of Taylor. The rejection itself demonstrates that Taylor fails to teach the invention in the same level of detail as recited in Claim 1. First, there has been no showing that the PIN of Taylor is "multiple parameters." Second, a PIN is associated with a user and is used in verification and authentication of a user and not in selecting an application. The reference itself contradicts the interpretation in the rejection. For example,

At step 47, the desired application is selected using the input device (keypad, trackball, etc. provided on the reader. . . . When the desired application . . . has been selected, it is . . . entered by pressing a return key . . .

Taylor, Col. 5, lines 16 to 22.

Thus, Taylor explicitly taught that a user selects the application, and it is not done using a PIN as stated in the rejection. Finally, the rejection also demonstrates that the claim limitations have not been properly interpreted. Only one of the above distinctions is required to overcome the anticipation rejection. Applicant requests

reconsideration and withdrawal of the anticipation rejection of Claim 1 in view of Taylor.

Claims 2, 4, 19 and 20 depend from Claim 1 and so distinguish over Taylor for at least the same reasons as Claim 1. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 2, 4, 19 and 20 in view of Taylor.

Claim 40 is a computer product claim that includes limitations similar to those discussed above with respect to Claim 1. Accordingly, the above comments with respect to Claims 1 in view of Taylor are incorporated herein by reference. Applicant requests reconsideration and withdrawal of the anticipation rejection of Claim 40 in view of Taylor.


Claims 41, 43, 58 and 59 depend from Claim 40 and so distinguish over Taylor for at least the same reasons as Claim 40. Applicant respectfully requests reconsideration and withdrawal of the anticipation rejection of each of Claims 41, 43, 58 and 59 in view of Taylor.

Claims 1 to 59 remain in the application. Claims 1, 7, 8, 9, 10, 30, 39, 40, 46, 47, 48, and 49 are amended. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on January 30, 2006.

Respectfully submitted,



Forrest Gunnison
Attorney for Applicant(s)
Reg. No. 32,899
Tel.: (831) 655-0880



Attorney for Applicant(s)

January 30, 2006
Date of Signature